

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

**Hon. Matthew F. Kennelly**

**FILED UNDER SEAL**

**PLAINTIFFS' STATEMENT OF COMPLIANCE WITH LOCAL RULE 37.2**

This Local Rule 37.2 Statement accompanies Plaintiffs' Motion for Leave to Reopen the 30(b)(6) Deposition of Defendant MIT and to Compel MIT to Provide a Designee Knowledgeable About Certain Limited Topics. Plaintiffs have conferred in good faith with MIT in an effort to resolve issues raised by this Motion.

Plaintiffs took the final portion of their 30(b)(6) deposition of MIT, in which David duKor-Jackson served as designee, on May 2, 2024. On May 2, 2024, in a related meet-and-confer, Plaintiffs raised with MIT's counsel that they believed Mr. duKor-Jackson was inadequately prepared. Four days later, on May 6, 2024, Plaintiffs' counsel sent MIT's counsel a letter detailing with specificity how Mr. duKor-Jackson was unprepared and requested an additional two hours of deposition time with a witness adequately prepared to discuss Topics 7-13. (Ex. 15 to Pls.' Mot. to Compel, 5/6/24 Letter from E. Noteware to MIT Counsel). MIT's counsel responded on May 7, 2024, declining to provide an adequately prepared witness for follow-up questioning. (Ex. 16 to Pls.' Mot. to Compel, 5/7/24 Letter from J. Rybnicek to E. Noteware). The Parties met and conferred telephonically on May 9, 2024 but were unable to reach agreement and determined that they had reached impasse.

## I. Conclusion

Plaintiffs respectfully submit that they have complied with Local Rule 37.2 as to the issues that are addressed in the accompanying Motion.

Dated: May 14, 2024

Respectfully Submitted,

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